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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,	)	No. CR 06-00095 JF
	)	
12 Plaintiff,	)	
	)	
13 v.	)	<b>STIPULATION AND [PROPOSED]</b>
	)	<b>ORDER TO CONTINUE STATUS DATE</b>
14 FRANCISCO JAVIER ALCAZAR,	)	
	)	
15 Defendant.	)	
_____	)	

16 Assistant United States Attorney Matthew Harris and defendant, Francisco Alcazar,  
17 through his counsel, Assistant Federal Public Defender Angela M. Hansen, agree and stipulate  
18 that the status hearing in the above-captioned matter, presently scheduled for Wednesday, July  
19 12, 2006, should be continued to August 23, 2006 at 9:00 a.m.

20 Mr. Alcazar's counsel needs additional time to review the discovery, which includes  
21 several audio and video recordings, discuss the discovery with her client and to investigate this  
22 case. Additionally, defense counsel requested some additional discovery from the government,  
23 and government counsel is considering whether or not to produce this discovery to the defense.

24 For these reasons, the parties therefore AGREE AND STIPULATE to continue the status  
25 hearing date and further agree that time should be excluded from and including July 12, 2006,  
26 through and including August 26, 2006, for continuity of counsel and to provide counsel  
reasonable time to prepare, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A) and

1 (B)(iv). Accordingly, the United States and the defendant agree that granting the requested  
2 exclusion of time will serve the interests of justice and outweigh the interests of the public and  
3 defendant in a speedy trial.

4  
5 Dated: July 10, 2006

/s/  
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ANGELA M. HANSEN  
Assistant Federal Public Defender

6  
7  
8 Dated: July 10, 2006


/s/  
\_\_\_\_\_  
MATTHEW S. HARRIS  
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	No. CR 06-00095 JF
	)	
Plaintiff,	)	<b>[PROPOSED] ORDER CONTINUING</b>
	)	<b>STATUS DATE AND EXCLUDING</b>
v.	)	<b>TIME</b>
	)	
FRANCISCO JAVIER ALCAZAR,	)	
	)	
Defendant.	)	
_____	)	

Good cause appearing, IT IS HEREBY ORDERED that the period of delay from July 12, 2006, to and including August <sup>23</sup>~~26~~, 2006, be excluded for purposes of Speedy Trial Act computations pursuant to Title 18, United States Code, Sections 3161(h)(8)(A) and 3161(h)(8)(B)(iv). This exclusion provides defendant continuity of counsel and reasonable time necessary for defense counsel's effective preparation. As such, the Court finds that the ends of justice outweigh the interest of the public and the defendant in a speedy trial.

Dated: July 12, 2006

  
JEREMY FOGEL  
United States District Judge

1 Distribute to:

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